

196054

SA
ORS

STATE OF SOUTH CAROLINA

(Caption of Case)

Combined Application of South Carolina Electric &
Gas Co. for a Certificate of Environmental
Compatibility and Public Convenience and Necessity
and for a Base Load Review Order for the
Construction and Operation of a Nuclear Facility at
Jenkinsville, SC

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2008 - 196 - E

RECEIVED

(Please type or print)

Submitted by: Ruth Thomas

SC Bar Number:

Address: 1339 Sinkler Road
Columbia, SC 29206

Telephone: 803-782-3000

Fax:

Other:

Email:

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

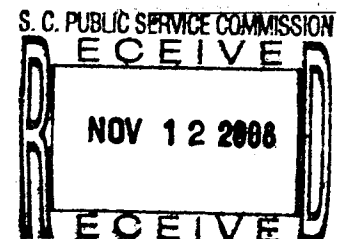
☐ Request for item to be placed on Commission's Agenda
expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form



November 10, 2008

Mrs. Ruth Thomas
1339 Sinkler Road
Columbia, SC 29206

Public Service Commission
Charles L. A. Terreni
Chief Clerk Administrator
PO Drawer 11649
Columbia, SC 29211:

Dear Mr. Terreni:

The following are discovery requests submitted on behalf of Ruth Thomas directed to the Office of Regulatory Staff and South Carolina Electric and Gas. As the hearing begins December 1, 2008, an expedited reply would be appreciated.

REQUESTS DIRECTED TO THE PANEL WHICH WILL TESTIFY FOR THE ORS:

1. Please list any and all sources for references which were used by the panel in evaluating SEC&G's application to build and operate two new nuclear reactors, as presented in the Combined Application, Docket No. 2008-196-E.
2. Please provide a list of Public Service Commission proceedings which were reviewed by the panel or a panel member, when a nuclear power plant was under consideration, including those of Duke Power as well as SCE&G and Santee Cooper.
3. Please provide a detailed account of the process used by the panel or ORS to obtain input from electric customers.
4. Please provide a listing of any and all meetings held with SCE&G customers, including such information as time, place, number attending, method of notification, breakdown between residential, small business, industry, etc.
5. Please provide copies of any survey forms which were circulated to electric customers, and information on the use of such input.
6. In discussing any and all input from electric customers, please address the following:
 - a. What percentage of the input was from residential customers?
 - b. What percentage of the input was from persons and groups taking part in the Conservation Project?
 - c. What role does the cost of energy have in the public's thinking on energy choices?
 - d. What differences did the panel find between the data gathered by SCE&G and the data gathered by the ORS panel?

REQUESTS DIRECTED TO BOTH SCE&G AND ORS:

1. Please provide a listing of any and all evaluations (and the location at which they can be viewed or the documents themselves) of Westinghouse AP1000 reactor which have been done by independent engineering firms or think tanks which support the company's assertion that the Westinghouse AP 1000 is an "advanced nuclear generating design" (page 2, SCE&G's Application, this Docket.) Such independent evaluations should address: problems yet to be resolved, scale of the prototype being tested, stage of design development, and stage of the planned safety systems.

2. Please provide a listing of any and all independent evaluations (and the location at which they can be viewed or the documents themselves) of predictions regarding the Westinghouse AP 1000 reactor in terms of reliability, efficiency, safety, and economy.

REQUESTS DIRECTED TO SCE&G:

1. How many people are currently employed in the public relations department of SCE&G?

2. How many were hired specifically to direct public relations efforts for this project?

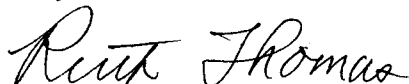
3. What is the yearly budget for public relations at SCE&G? For this year? How much of that is dedicated to public relations for this project?

4. Referring to SCE&G Rebuttal document, p. 16, lines 2-4:

- a. How long ^{has} the Conservation Rate been in effect?
- b. How are customers notified of its availability?
- c. How many customers have requested the energy consumption analysis?
- d. How many home energy audits have been conducted? In the past month? six months? year?

5. If the Company were to spend the same amount of money for energy conservation measurers as for building the proposed nuclear plants, what would be the reduction in demand for its customer base? Please provide the results of any studies on this subject conducted by the Company, with a listing of where the studies can be viewed independently or the documents themselves.

Respectfully submitted,



Ruth Thomas